

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag. No. 22-6014 (DEA)
v. : Hon. Douglas E. Arpert
BRIAN J. CRANN :

NOTICE OF MOTION FOR REVOCATION OF ORDER OF RELEASE

TO: Lisa Van Hoeck
Assistant Federal Public Defender
Office of the Federal Public Defender
22 South Clinton Avenue,
Trenton, New Jersey 08609

PLEASE TAKE NOTICE that on February 7, 2022, or as soon thereafter as counsel may be heard, the United States of America, by and through its attorney, Philip R. Sellinger, United States Attorney for the District of New Jersey, Alexander E. Ramey and Michelle S. Gasparian, Assistant U.S. Attorneys, appearing, will move before the United States District Court, pursuant to 18 U.S.C. § 3145, for *de novo* review and revocation of the order of the Honorable Douglas E. Arpert, U.S.M.J., dated February 4, 2022, granting pretrial release of defendant Brian J. Crann. The United States respectfully asserts that defendant Crann poses a clear and significant danger to the community, and that the combination of conditions included in Judge Arpert's Order do not and cannot reasonably assure the safety of the community. In support of its motion, the United States will rely on the materials submitted to Judge Arpert and the arguments of counsel on

February 4, 2022, and the additional arguments of counsel at a hearing, which the United States respectfully requests.

In addition, Judge Arpert's February 4, 2022 Order included a stay until close of business on February 7, 2022, pending the United States' motion for *de novo* review pursuant to § 3145. By this motion, the United States also requests a further stay of Judge Arpert's February 4, 2022 Order until the government's application for review of that order is decided.

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney

s/ Alexander E. Ramey

MICHELLE S. GASPARIAN
ALEXANDER E. RAMEY
Assistant U.S. Attorney

Dated: February 6, 2022